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March 16, 2023

VIA ECF

Hon. Edgardo Ramos
United States District Court
Southern District of New York
40 Foley Square, Courtroom 619
New York, New York 10007

Re: SEC v. Genesis Global Capital, LLC and Gemini Trust Company, LLC, 1:23-cv-00287

Dear Judge Ramos:

This firm represents Defendant Genesis Global Capital, LLC (“GGC”) in the above-referenced case. In accordance with Your Honor’s Individual Practices in Civil Cases Rule 1(E), GGC respectfully writes, without opposition from Plaintiff Securities and Exchange Commission (“SEC”), to request a 45-day extension of its time to answer or otherwise respond to the Complaint (ECF 1), from March 20, 2023 until May 4, 2023.

The Complaint was filed on January 12, 2023. ECF 1. On January 18, 2023, GGC agreed to waive formal service of the Complaint. ECF 10. Currently, GGC’s deadline to answer is March 20, 2023. On March 13, 2023, the Court extended co-defendant Gemini Trust Company, LLC’s (“Gemini”) deadline to answer or otherwise respond to the Complaint by 45 days, until May 4, 2023. ECF 15.

GGC respectfully requests a 45-day extension, until May 4, 2023, of its time to answer or otherwise respond to the Complaint. The purposes of the extension are to align GGC’s deadline to respond to the Complaint with co-defendant Gemini’s, as well as to allow time for GGC to explore a possible consensual resolution of the case with the SEC. There is good cause to align the two defendants’ time to respond to the Complaint, because the Complaint alleges overlapping facts and legal theories against both defendants, and coordination will streamline the case schedule and presentation of any legal issues to the Court, and allow the parties to litigate the matter in a more organized and efficient manner.

Counsel for GGC has conferred with counsel for the SEC, which has reviewed this letter and does not oppose GGC’s requested extension. No other requests for adjournments or extensions of time have been previously requested by GGC.

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Thank you for your attention to this matter.

Respectfully submitted,

/s/ Jason Gottlieb

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cc: all parties via ECF